



2101 L Street, NW Suite 300 Washington, DC 20037

Vanessa A. Countryman, Secretary  
Securities and Exchange Commission  
100 F Street NE  
Washington, DC 20549-1090

June 13, 2022

We write in support of The Enhancement and Standardization of Climate-Related Disclosures for Investors (File No. S7-10-22).

Terra Alpha Investments invests in global public equities. The firm was established in 2014, with experience from some of the largest leading investment firms, and originally designed to specifically use environmental data such as Scope 1,2,3 emissions data as part of our investing process. Climate-related data helps us construct portfolios of companies that are prepared for future continued success.

Disclosed climate-related data helps our firm make investing decisions. Mandated disclosure will expand the universe of companies we can consider investing in. In an ever increasingly global world, standardization of a baseline set of emissions disclosures such as these proposed by the Commission would be useful for us as investors. As regulatory authorities around the globe have introduced voluntary and mandatory climate-related disclosures, alignment would be useful for registrants and investors.

As an US-based investor in public, global equities, we want to emphasize the following points:

- Scope 3 emissions should be assessed and disclosed by all companies along with Scope 1 and 2, and not just the largest or those that self-determine it is material to their business.
- Timing to begin this mandated disclosure cannot start soon enough.
- Inclusion of climate-related information in the financial statements promotes consistency in reporting, and is appropriate because climate-related impacts can materially affect a company's financial position and operations.
- A baseline set of globally disclosed environmental information - such as those proposed in this rule - would be a useful baseline for registrants and investors globally.
- Efforts to align with the developing ISSB standards are sensible and helpful for all.
- Assurance methodology should be disclosed if not performed by an accounting firm.
- We advocate that targets and plans for GHG emissions reductions should be science-based and aligned with a 1.5 degree scenario, exclude offsets except as a last resort, and we support the alignment with the TCFD expectations.

Responses to the specific questions the Commission posed are in the pages that follow.

Sincerely,

Timothy P. Dunn, CFA  
Managing Partner and Chief Investment Officer